



# Southwest Youth Collaborative

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Mr. Steve Marquardt  
U.S. Environmental Protection Agency  
Fax: 312-886-5824

Dear Mr. Marquardt;

Thank you for the opportunity to review this project. The Southwest Youth Collaborative represents African-Americans, Arab-Americans, and Latinos on the Greater Southwest Side of Chicago. The Collaborative serves youth and families living in the geographic area from Englewood to Greater Lawn. Since 1992, we have offered a wide range of programming including job development, job training, family empowerment, and cultural diversity.

In our experience, we have learned that it is very difficult to bring jobs into economically-distressed communities. New development will locate in communities such as Englewood or West Englewood only if there are sufficient benefits to be received through an incentive program targeted specifically at these areas. Without new development, these communities will continue to be burdened with growing poverty, social problems, urban blight, and contaminated brownfields.

We are very concerned about the direction of the proposed Chicago XL project. According to the proposal, the EPA believes that this project should be directed towards areas which need "revitalization, redevelopment, creation of jobs, and other factors". However, we see nothing in this proposal to indicate that areas which are most in need of revitalization and redevelopment will receive any benefit from this project. To the contrary, it appears that the benefits from this project will be given to other parts of the metropolitan area. Under this proposal, why would an industry locate in West Englewood when it receives the same benefits by locating anywhere else in the metropolitan area as long as it is near a bus stop or rail line? It is disingenuous to state that new development will locate in an area designated as/or eligible to be an Empowerment Zone, Enterprise Community, or New Market Act area if the industry gets the same reward by locating elsewhere. That is why these economic incentive programs were established in the first place, to attract development to targeted areas. This XL project would steer development away from the areas most in need of revitalization, such as Englewood and West Englewood, and send it to wealthier areas near transit stops.

The proposal also does not carry any penalties for industries which relocate from distressed areas to designated "development areas" located near suburban transit stops. There is nothing to prevent an industry from leaving the inner city to locate near a suburban transit stop. In fact, this industry would be rewarded by the project for leaving the inner city.

It is true that some residents from disenfranchised communities might find jobs in industries which locate elsewhere but are near public transportation. However, this has two drawbacks. First, it would not in any way help eradicate the urban blight and brownfields in the most distressed areas. New development which locates within these communities will clean up brownfields and blight. This factor is very important and not addressed in the proposal. Second, long commute times on public transportation keep parents away from their families for longer

periods of time. As indicated earlier, there is no incentive for industries to locate anywhere near distressed areas. This can contribute to greater social problems in the family and community. Economic redevelopment is a critical element in repairing the economic and social fabric of the most distressed communities. Without targeted redevelopment of communities such as Englewood and West Englewood, our organization, and others, will be forced to continue scratching for job development while putting a band aid on the social problems resulting from economic disenfranchisement.

On the other hand, we must be careful that the new development will not place an undue environmental burden on the most distressed areas. For this reason, there must be sufficient public control over what type of industry locates within the community. There should also be some guarantee that residents will receive some of the jobs in the new development. However, it is difficult to determine whether this proposal provides sufficient community control over new development. If public input is an important consideration in this project, why is the public comment period only open for 14 days?

In closing, we support a program which brings economic development and cleans the environment in areas which need revitalization, redevelopment, and job creation. We apparently have a different definition of which areas should receive priority treatment. We support communities such as West Englewood, while the proposal gives equal, and thus preferential treatment, to other areas which simply meet the criterion of being located near a transit stop and could use new development. We do not believe that areas which are located near transit stops should receive the same benefits from a program as economically distressed areas. We do not believe that the entire city of Chicago should be designated a development area, which would happen if the bus stop criterion is kept in the proposal.

Thank you,

  
Camille Odeh

SWYC Ex-Director